

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

VELMA JUANITA HOWELL, individually, and on
behalf of others similarly situated,

Plaintiff,

v.

SMARTMATCH INSURANCE AGENCY, LLC

Defendant.

Case No. 4:23-cv-00040-BCW

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), Plaintiff Velma Juanita Howell, on behalf of herself and others similarly situated (“Plaintiff”) and Defendant SmartMatch Insurance Agency, LLC (“Defendant” and collectively with Plaintiff, the “Parties”) respectfully request that the Court enter the Agreed Protective Order agreed to by the Parties, a copy of which is attached hereto as Exhibit A, and in support thereof state as follows:

1. The Parties have conferred regarding the necessity of a confidentiality and protective order because the discovery the Parties may propound in this matter, may involve documents and materials that contain information that is confidential, proprietary, or personal, or is otherwise of a highly sensitive and valuable nature, such that it should be protected.

2. Accordingly, to address these concerns and any confidentiality concerns that may arise on the part of either Party in the future, the Parties have agreed to and executed the attached Agreed Protective Order to govern discovery in this matter.

3. The Parties further agree that the attached Agreed Protective Order should specifically apply to any and all documents or information obtained from Non-Parties in this matter.

WHEREFORE, the Parties respectfully request that the Court enter the Agreed Protective Order attached hereto as Exhibit A.

**WE SO MOVE
and agree to abide by the
terms of this Order**

/s/ Jacob U. Ginsburg

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Attorneys for Plaintiff

**WE SO MOVE
and agree to abide by the
terms of this Order**

/s/ William E. Raney

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on the following parties via the Court's CM/ECF electronic filing system on this 12th day of April, 2023:

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/s/ William E. Raney
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